



August 12, 2014

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Dear Commissioner Pai:

We are writing to follow up on the attached comments from 21 civic leadership organizations, including the California Emerging Technology Fund (CETF), that were formally filed with the FCC. We respectfully request that you and your colleagues secure a public benefit from the Comcast acquisition of Time Warner Cable (TWC) and trade of territory with Charter Communications in the form of the 5 Recommendations below (further explained in the attachment) to ensure acceptable performance on the Comcast affordable broadband access program called Internet Essentials (which today is available to households with students on free-or-reduced lunch):

1. Include All Low-Income Households
2. Set Performance Goals
3. Capitalize an Independent Fund and Coordinate with States
4. Establish an Advisory Oversight Committee
5. Offer Stand-Alone Internet Service

Today, approximately 25% of the population remains offline at home largely because of concentrated and persistent poverty and are being left farther and farther behind at an accelerating pace. There must be an affordable broadband rate widely available. The most immediately opportunity to make that quest a reality is for the FCC to set and enforce acceptable performance by Comcast on implementation of their Internet Essentials program, which was proposed to facilitate regulatory approval of their purchase of NBC Universal in 2010. Although the program has a laudatory price-point, we and our partners know first-hand all the problems that have plagued the subscription process, resulting in just 11% of the eligible population being signed up during the last 3 years.

The Comcast-TWC-Charter corporate consolidation is the pivotal for the nation when it comes to equitable access for low-income households and poor neighborhoods. It is particularly critical for California because the new Comcast service area will include 87% of all California students on free-or-reduced lunch. Thus, bold action is an imperative. Your voice is needed to achieve acceptable performance and public accountability for reaching the most disadvantaged populations.

Sincerely,

  
Sunne Wright McPeak  
President and CEO